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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
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14 SERVICE EMPLOYEES INTERNATIONAL)
15 UNION, *et al.*,)

16 Plaintiffs,

17 vs.

18 SAL ROSSELLI, *et al.*,

19 Defendants.
20

Case No. 09-CV-0404 WHA

SUPERSEDEAS BOND POSTED BY
DEFENDANT FRED SEAVEY

Hon. William H. Alsup

21 A judgment was entered in the above-captioned case in the United States District Court
22 for the Northern District of California on April 12, 2010, against appellant Fred Seavey in favor
23 of appellee Service Employees International Union-United Healthcare Workers-West (UHW) in
24 the amount of \$36,600.

25 Fred Seavey has filed a timely notice of appeal of the judgment to the United States Court
26 of Appeals for the Ninth Circuit and desires to suspend enforcement of the judgment pending
27 determination of the appeal.
28

1 Fred Seavey undertakes and promises to pay to SEIU all damages, costs, and interest that
2 may be awarded to it following the appeal of this matter up to the sum of \$45,750 if

- 3 a. the judgment so appealed is affirmed;
4 b. the appeal is dismissed; or.
5 c. Fred Seavey fails to promptly pay to SEIU all sums awarded against him, in or
6 following the appeal in this action, including any costs that the court of appeal may
7 award if the judgment is modified.
8

9 If Fred Seavey fulfills the obligations on appeal set forth above, then this obligation will
10 become void. Otherwise this obligation will remain in full force and effect.

11 Fred Seavey hereby satisfies the requirement of Local Rule 65.1-1 of the United States
12 District Court for the Northern District of California, and the Court's orders by:

13 (1) Depositing 50 percent (\$22,875) of the required bond in cash with the Clerk of
14 the Court; and

15 (2) Securing a pledge of real property in California not exempt from execution,
16 the value of which is more than sufficient to satisfy the remaining 50 percent of the bond.
17 This pledged property is owned by William G. Seavey, who is the natural brother of Fred
18 Seavey.

19 William G. Seavey declares as follows:

20 (1) The address of the property that I own that I am pledging as security for this
21 bond to secure payment of the judgment is 5960 11th Avenue, Sacramento, California.

22 (2) I am the owner of said property and have the authority to pledge said property
23 as security.

24 (3) The fair market value of the property is \$260,000.

25 (4) The outstanding balance of all loans secured by the property is \$236,887.

26 (5) The names and addresses of all lenders of all loans secured by said property
27 is/are: CitiMortgage, PO Box 689196, Des Moines IA 50368.

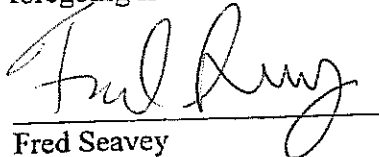
28 (6) All liens, charges, and other encumbrances on the property are: none.

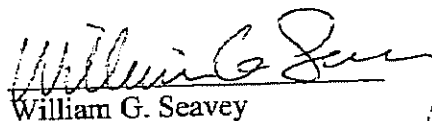
1 (7) I hereby promise not to alienate, encumber or impair the value of the property
2 until the bond is discharged without leave of Court.

3 (8) I hereby waive any homestead exemption pertaining to the property.

4 (9) Fred Seavey hereby promises to record this bond and the judgment against
5 him with the Sacramento County Recorder promptly upon its approval by the Court.

6 We declare under penalty of perjury that the foregoing is true and correct. Executed on
7 November 23, at Oakland, California.

8 
Fred Seavey

9
10 
11 William G. Seavey

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14 Execution of judgment is hereby stayed as to defendant Fred Seavey pending appeal.

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17 Dated: December 7, 2010.

